

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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AULISTAR MARK, HANCHEN LU and	:	
ANDREW HUDSON, Individually and on Behalf of	:	
All Others Similarly Situated,	:	
	:	
Plaintiffs,	:	Civil Action No. 1:13-cv-04347-AJN
-against-	:	
	:	
GAWKER MEDIA LLC, and NICK DENTON,	:	
	:	
Defendants.	:	
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AFFIDAVIT OF BRIAN BARRETT

BRIAN BARRETT declares, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am of legal age and am competent to make this Declaration. I have personal knowledge of the facts sets forth in this Declaration, or I have learned said facts to speak on behalf of Gawker Media, LLC.

2. I have worked since 2009 at Gizmodo.com, Gawker Media, LLC's ("Gawker's") blog on gadgets and technology. I first served as Contributing Editor, then Senior Editor/News Editor, and now I am the Managing Editor.

3. While I never directly managed the interns for the site myself, I have sometimes overseen their stories on a case-by-case basis and assigned them tasks. As an editor at Gizmodo I made observations about the interns' work, but I was never responsible for training or overseeing interns. Sam Biddle (a former intern and current Valleywag.com editor) and Kyle Wagner (a former intern, former Gizmodo editor, and

current Deadspin editor) were in charge of managing the interns. Generally Gizmodo had about two interns at a time, but never more than four.

4. There was always the same basic informal training for each intern. We trained them on how to find the types of stories that were most appropriate for Gizmodo, how to pitch a story idea, what constitutes a compelling headline on Gizmodo, and how to write a good synopsis. Learning to pitch appropriate stories effectively was the biggest part of what they were trained to do. To practice this skill, they would put their pitch on Campfire (an internal chatroom program) for editors to consider. The ability to effectively pitch a story to an editor is a skill is transferrable beyond Gizmodo or Gawker, and is needed by any reporter who wants to be successful in this industry. The more effective the pitch, the more likely the editor is to publish the story. The interns were also trained in how to research and build a source list that would allow them to reliably find stories early. Compiling a good source list is also an important skill that a reporter will use throughout their career.

5. Once interns had competence in researching and pitching stories, they were sometimes given the opportunity to write their own articles, which always included their bylines. As long as I have been here, everyone's work on the site has been reviewed, but interns' articles in particular were more carefully reviewed and edited because they were less experienced writers. If an intern was given the opportunity to write a post for the site, the editors went through many rounds of editing and gave the interns lots of feedback. If the intern did well, they were given the opportunity to write more and more posts.

6. Full-time employee training is less involved and not as comprehensive as intern training since we assume that they are already well-versed in the basics. We expect them to already know how to research and pitch stories. When a full-time employee starts working at Gizmodo, they are expected to be able to write and post right away, whereas that was not the case for interns. New full-time employees do have their writing edited at first, but mostly to get their voice aligned with the Gizmodo voice and style. With interns, training was more focused on the basics.

7. Interns were also taught how to do online research. Editors would sort through the results interns found to select interesting material for a post.

8. There was not a set schedule of hours for the interns, but most days, they would begin at 8am and finish around 5:30 or 6pm. The interns generally worked five days a week, usually not on weekends. Interns were encouraged not to stay later than editors. When interns were in school, we were respectful of their school obligations, and we would work around their school hours. The length of internships varied but they often lasted around three months at a time.

9. To my knowledge, interns were not paid. I never paid them anything out of pocket except the occasional coffee.

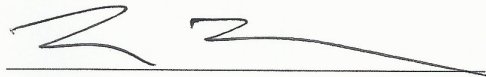
10. Interns did not formally supervise each other, but the experienced interns sometimes helped out new interns. For example, Kyle was an experienced intern and later was hired as an employee. He had an active role helping new interns get acclimated, as he was easily able to relate to them.

11. Most of the interns left on good terms, and I cannot think of anyone who had a bad experience. Usually when they were leaving, I would tell them that I would be happy to give them a reference.

12. Having served as a Gizmodo intern gives people a huge leg up in the online publishing industry. It really gives them an opportunity and learning experience that they may not have had otherwise. Just knowing that so many past interns have gone on to work for *Wired*, *Fast Company*, and other prominent titles based on their Gizmodo experience makes me very proud.

I declare under the penalty of perjury under the laws of the State of New York and the United States of America that the foregoing is true and correct.

Executed this 10 day of January, 2014 in Birmingham, AL.

A handwritten signature in black ink, appearing to read 'BRIAN BARRETT', written over a horizontal line.

BRIAN BARRETT